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U.S. Department of Transportation Room PL 401
400 Seventh Street, SW
Washington, D.C. 20590-0001

Reference: Docket No. TSA-2003-14610-18
Docket No. FMCSA-2001-11117-29

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DEPT OF TRANSPORTATION
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Dear Sir or Madam:

We concur with the recommendations made by AAMVA in its 20 June 2003 correspondence as submitted in response to the final interim rule published 5 May 2003. The infrastructure and funding does not exist at most of the state DMVs to comply with the fingerprint capturing and administration of this program.

On 4 June 2003, the RSPA published Document number RSPA-2003-149 stating that TSA and DOT determined that the provisions of the 5 May 2003 will not apply to the railroad transportation workers. Part of the reasoning given was the existence of a satisfactory background screening process that is independently conducted.

With 3.5 million HAZMAT endorsed drivers in the U.S. and more to follow given attrition assumptions and renewals, this is a significant programmatic and logistical challenge. Conducting the background screening is a relatively small portion of the overall task. The capturing of the information and biometrics, compliance with FCRA, and proper adjudication are tremendous efforts. It is our recommendation that TSA/DOT consider contracting for this program to an independent party that is in the business of performing these functions and has the capability to interface with the large number of trucking companies and their employees and independent contractors that are endorsed or will apply for endorsement and/or renewal. The Contractor would manage the entire process and receive payments for its services directly from the holders of the endorsement or their employer. This would make the cost to the state level DMVs and to TSA/DOT negligible while still ensuring that the congressional and DHS intentions and objectives are met.

This business model is sound, proven and in use with commercial retail companies whose motivations are strong given their sizable loss prevention and workplace violence concerns.

Sincerely,

Eid Access, Inc.

A handwritten signature in black ink, appearing to read "Karen L. Schneider". The signature is fluid and cursive, with the first name "Karen" being more prominent.

Karen L. Schneider

National Strategic Partnerships Manager